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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SYLVIANE D. WHITMORE, and

LARRY MCDANIEL,

Defendants.

Case No. 2:17-cr-00110-APG-CWH

**Stipulation to Continue Deadline for  
Government's Response to Defendants' Joint  
Motion for New Trial [ECF No. 272]  
(Second Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, through Richard Anthony Lopez and Mina Chang, Assistant United States Attorneys, counsel for the United States of America, Lisa Rasmussen, counsel for defendant Sylviane D. Whitmore, and Daniel Hill, counsel for defendant Larry A. McDaniel, that:

- (1) The deadline for the Government's Response to defendants' Joint Motion for New Trial (ECF No. 279), currently set for June 17, 2022, be vacated and continued to July 1, 2022; and

- 1 (2) The deadline for defendants' Replies, currently set for July 1, 2022, be vacated and  
2 continued to July 15, 2022.

3 This Stipulation is entered into for the following reasons:

- 4 1. On April 15, 2022, defendants Whitmore and McDaniel filed their Joint Motion  
5 for New Trial and 34 accompanying exhibits. ECF No. 272.
- 6 2. On May 11, 2022, the Court ordered the Government to file its response by June  
7 17, 2022, and defendants to file their replies by July 1, 2022. ECF No. 279.
- 8 3. Government counsel needs additional time to complete its research, draft, and  
9 finalize an appropriate response to the defendants' motion.
- 10 4. This continuance is not sought for purposes of delay, but to provide the  
11 Government the necessary time to file an appropriate response. For the reasons  
12 stated above, the

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ends of justice would best be served by a continuance of the deadline.

5. Denial of this request for continuance of the deadline could result in a miscarriage of justice.

6. Defendants Whitmore and McDaniel are out of custody and do not object to the request for continuance.

This is the second request for a continuance.

DATED this 16th day of June, 2022.

Respectfully submitted,

LAW OFFICES OF KRISTINA  
WILDEVELD & ASSOCIATES

JASON M. FRIERSON  
United States Attorney

/s/ Lisa Rasmussen  
LISA RASMUSSEN  
Counsel for Defendant Sylviane D. Whitmore

/s/ Tony Lopez  
RICHARD ANTHONY LOPEZ  
MINA CHANG  
Assistant United States Attorneys

HILL LAW FIRM

/s/ Daniel Hill  
DANIEL HILL  
Counsel for Defendant Larry A. McDaniel

1 UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 SYLVIANE D. WHITMORE, and

7 LARRY MCDANIEL,

8 Defendants.

Case No. 2:17-cr-00110-APG-CWH

**Order on Stipulation to Continue Deadline for  
Government's Response to Defendants' Joint  
Motion for New Trial [ECF No. 272]  
(Second Request)**

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10 Based on the parties' stipulation to continue the deadline for the Government's  
11 Response to defendants' Joint Motion for New Trial, and good cause appearing therefore, the  
12 Court hereby finds that:

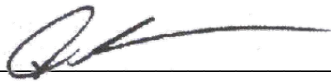
- 13 1. On April 15, 2022, defendants Whitmore and McDaniel filed their Joint Motion for  
14 New Trial and 34 accompanying exhibits. ECF No. 272.
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16 2022, and defendants to file their replies by July 1, 2022. ECF No. 279.
  - 17 3. Government counsel needs additional time to complete its research, draft, and finalize  
18 an appropriate response to the defendants' motion.
  - 19 4. This continuance is not sought for purposes of delay, but to provide the Government  
20 the necessary time to file an appropriate response.
  - 21 5. The parties agree to this continuance.
  - 22 6. Defendants Whitmore and McDaniel are out of custody and do not object to the  
23 request for continuance.
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**ORDER**

**IT IS HEREBY ORDERED** that the deadline for the Government's Response to defendants' Joint Motion for New Trial, currently set for June 17, 2022, be vacated and continued to July 1, 2022; and

**IT IS FURTHER ORDERED** that the deadline for defendants Whitmore and McDaniel's Replies, currently set for July 1, 2022, be vacated and continued to July 15, 2022.

**IT IS SO ORDERED** this 17<sup>th</sup> day of June, 2022.

  
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HON. ANDREW P. GORDON  
UNITED STATES DISTRICT JUDGE